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August 29, 2019

United States Magistrate Judge Roanne L. Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

By: ECF

RE: GEICO v. Wellmart, et al.  
Docket No. 19-CV-4414 (KAM)(RLM)

Dear Judge Mann:

The undersigned has been recently retained to represent Defendants Wellmart Rx, Simon Davydov and Muslan Nektalov in the instant matter. The instant letter is being sent with consent of counsel to Plaintiffs.

Based on differing dates of service of the Complaint, the defendants represented by this firm are required to file Answers or otherwise respond to the Complaint by August 29, August 30 and September 16, 2019. We would respectfully request that the Court grant an extension of this time for all answers/responses to be filed September 19, 2019.

The requested extension would be the first extension for the Defendants that we represent and this application is made with consent of Priscilla Kam of Rivkin Radler, LLP, attorneys for the Plaintiffs.

I thank the Court for its time and attention to this matter.

Respectfully Submitted,  
HARFENIST KRAUT & PERLSTEIN, LLP  
By: Neil Torczyner  
Neil Torczyner

CC: All counsel, via ECF